INTERMOUNTAIN POWER SERVICE CORPORATION

June 7, 2001

Richard Sprott, Director
Division of Air Quality
Department of Environmental Quality
P.O. Box 144820
Salt Lake City, UT 84114-4820

Attention: Milka Radulovic

Dear Director Sprott:

IPSC NOTICE OF INTENT: Corrections

On April 4, 2001, Intermountain Power Service Corporation (IPSC) submitted a Notice of Intent (NOI) to modify the Intermountain Generating Station (IGS) in Delta, Utah. Up through May 29, 2001, IPSC submitted other information for the NOI, including a Best Available Control Technology (BACT) analysis. Pursuant to a request from the Division of Air Quality, we are herewith submitting information that corrects inaccuracies found in those documents.

Corrections to the Notice of Intent, dated April 4, 2001:

Page 1, 2nd paragraph under Section (1) PROCESS DESCRIPTION:
This paragraph discusses boiler capacity in the last sentence. This should state that 'normal' boiler 'operating' capacity is about 6.2 million lbs steam per hour at 2822 psi drum pressure. The current boiler maximum capacity rating (MCR) is 6.6 million lbs steam per hour at 2975 psi.

Page 2, Last paragraph under Section (3) POLLUTION DEVICE DESCRIPTION:
This paragraph discusses proposed changes to NOx control technology in the last sentence. The term "moderately" should be removed, and the words "addition of best available control technology" should replace "replacement of the existing dual register low NOx burners with new technology staged combustion low NOx burners." The last sentence would then read "Also, the project includes installation of improved NOx controls, such as the addition of best available control technology."

Page 5, second bullet, "NOx Reduction Project":
The term "moderate" should be replaced with "BACT" in the first and last sentences.

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ATTACHMENT 1, Worksheet A:
A new worksheet is attached to correct oversights in decimal or arithmetic errors, specific to lead and beryllium.

ATTACHMENT 1, Worksheet B:
A new worksheet is attached to correct oversights in decimal or arithmetic errors, specific to lead and beryllium.

ATTACHMENT 1, Worksheet C:
This worksheet addresses hazardous air pollutants as required at R307-410-4. There are several chemicals for which screen modeling may be required. A new worksheet is attached with modeling results using SCREEN3.

Corrections to BACT Analysis, dated May 29, 2001:

Page 2, Table 1, Typical Coal Characteristics:
This table has several different types of ASTM analytical representations of coal. To clarify this, a new Table 1 is attached here.

Completion

We appreciate the efforts of your staff in working with us. In a June 1, 2001 meeting, IPSC & DAQ discussed a probable time line to bring an approval order to fruition. We therefore assume that our NOI application is considered complete. However, IPSC will continue to provide clarifying information as requested to ensure the approval process proceeds smoothly. If, for some reason your office foresees any problem that could delay the issuance of an approval order, please contact us as soon as possible.

If you or any one of your staff have any questions, please contact Mr. Dennis Killian, Superintendent of Technical Services, at 435-864-4414, or dennis-k@ipsc.com .

Cordially,

S. Gale Chapman
President and Chief Operating Officer

RJC/BP/db
Enclosures

cc: Blaine Ipson, IPSC
Reed Searle, IPA
Mike Nosanov, LADWP

[redacted]						**ATTACHMENT 1**: Worksheet A		
NOI / PSD Calculations								
Operating & Production								
Parameter	**Average Value**	**UoM**	**Post-Change Value**					
Rated Output	875	Mwhe	950					
Fuel Use (Coal)	5,264,292	tons/yr	5,578,473					
Plant Operating Time	16,386	Unit hours	16,386					
Heat Value	11,872	BTU/lb	11,872					
Heat Input (Actual)	7,628	MMBtu/hr	8,083					
Heat Input (Design)	8,352	MMBtu/hr	9,225					
Heat Rate	9,564	Btu/KWhr	9,475					
Flow - Stack	125,000,000	scfh	133,000,000					
Emissions					**PSD Significance**	**PSD Major**	**Difference**	**PSD**
Parameter/Pollutant	**2 Yr Average Value**	**UoM**	**Post-Change Value**	**Change+/-**	**Levels**	**Trigger Value**	**(Trigger - Post)**	**Triggered?**
PSD								
SO2	3586.31	Tons	3513.10	-73.21	40	3626.31	-113.21	N
SO2 % Removal	93.62	%	93.88					
NOx	25143.97	Tons	24346.10	-797.87	40	25183.97	-837.87	N
CO	1317.06	Tons	1394.60	77.54	100	1417.06	-22.46	N
PM10	273.77	Tons	283.51	9.75	15	288.77	-5.25	N
Lead	0.087	Tons	0.105	0.018	0.600	0.687	-0.582	N
VOC	12.65	Tons	13.40	0.75	40	52.65	-39.25	N
Beryllium	0.0010	Tons	0.0011	0.00010	0.0004	0.0014	-0.00030	N
Mercury	0.081	Tons	0.105	0.024	0.100	0.181	-0.076	N
Fluorides (HF)	9.70	Tons	10.16	0.46	3	12.70	-2.54	N
Sulfuric Acid	4.06	Tons	4.05	-0.01	7	11.06	-7.01	N

PSD / NSPS Observations										ATTACHMENT 1 Worksheet B	
[illegible]											
	SO2 (tons)	SO2 % Removal	Nox (tons)	CO (tons)	PM10 (tons)	Lead (lbs)	VOC (lbs)	Beryllium (lbs)	Mercury (lbs)	Fluorides (HF) (lbs)	Sulfuric Acid (lbs)
1996	3759	92.28	19688	1080	83	224		3.57	270	19139	*
1997	5076	92.05	22675	1291	108	263		4.17	323	22905	*
1998	4281	92.67	25708	1321	114	167		2.23	331	23436	8440
1999	3698	93.57	24179	1312	249	156	25394	2.18	123	19167	8234
2000	3474	93.67	26109	1322	299	181	25204	1.89	201	19621	8015
5 Year Avg	4058	92.8	23872	1265	171	200	25299	2.81	250	20854	8230
Last 2 yr Avg	3586	93.6	25144	1317	274	174	25299	2.03	162	19394	8124
TRIGGER: Average + Sig. Incr.	3826		25184	1417	289	1374	105299	2.83	362	25394	22124
Projected Actuals:	3513	93.88	24346	1395	284	210	26809	2.23	211	20313	8108

Plant Operational Data										NSPS Determination (lbs/hr)	
										Maximum NOx	Maximum SO2
		Plant Operating	Btu/lb	MBTU/hr	LB/MMBtu	lbs/hr	LB/MMBtu	lbs/hr		Emission Rate	Emission Rate
	Coal Usage (tons)	Hours	Coal HV	Avg Heat Input	NOx Emission rate	NOx Emission Rate	SO2 Emission Rate	SO2 Emission Rate		(Last 5 years)	(Last 5 years)
1996	4310562	15359	11880	6657	0.39	2564	0.07	489		6046	1150
1997	5156867	16564	11789	7343	0.37	2738	0.08	613		4872	1333
1998	5278344	16683	11823	7461	0.41	3082	0.07	513		5331	1279
1999	5244793	16482	11858	7556	0.39	2938	0.06	449		5007	1456
2000	5283790	16309	11885	7701	0.42	3202	0.06	428		5441	1379
5 Year Avg	5055271	16275	11843	7348	0.39	2905	0.07	498	Max. - Prev. 5 yrs:	6045	1456
Last 2 Year Avg	5264292	16386	11872	7628	0.40	3070	0.06	438	Proposed Average:	2972	429
Projected Actuals:	5578473	16386	11843	8064	0.37	2972	0.05	429	Proposed Max:	4613	1384

OPERATING CHANGES	Actual	Design					
	Max Heat Input	Max Heat Input (MMBtu/hr)	Fuel Use (coal, tons)	Heat Rate	Mlbs/hr Steam	Mwhe	Stack Flow (scfh)
Present Operation	7626	8352	5264292	9564	6.1	875	125,000,000
Proposed Operation	8083	9225	5,578,473	9475	6.9	950	133,000,000

ASSUMPTIONS:

All increases / decreases based on coal use only. Fuel oil & other bulk chemical chemical use not expected to change.
Estimated 15% nominal reduction, with new NOx controls, of 2 yr avrge NOx and 2854 ton/yr increase in potential NOx formation.
Estimated 4% nominal removal improvement in scrubber efficiency.
HAPs PSD triggers calculated per UDAQ Dispersion Modeling Guidelines at R307-410-4.
VOC's calculated from HAPs list.
Projected nominal efficiency improvement: 8.0%
Projected nominal capacity improvement: 8.6%
Projected heat input / coal usage increase: 5.9%
Projected uncontrolled NOx increase: 11.2%

SCREEN3 Modeling Results - HAP's

Listed compounds exceeded Emission Treshold Values, or had no OSHA values.

	Calc'd Results	Model Input	Model Output
POLLUTANT	Emission Rate (lbs/hr)	Emission Rate (g/s)	Max. Concentration (ug/m3)
Arsenic	0.001230355	0.000155025	0.00013
DEHP	0.001399686	0.00017636	0.0001479
Cyanide	0.047934441	0.00603974	0.005065
2,4-Dinitrotoluene	5.36866E-06	6.76451E-07	5.673E-07
Ethylene Dibromide	2.30085E-05	2.89907E-06	0.000002431
Propionaldehyde	0.007286035	0.00091804	0.0007699
Hydrogen Chloride	0.009981802	0.001257707	0.001055
Hydrogen Fluoride	0.056113641	0.007070319	0.00593

Assumptions:
Point Source
Stack Height 219m
Stack Diameter 8.6m
Gas Volume 2,166,667acfm
Stack Temp 322K
Ambient Temp 293K
Receptor Height 0m (flat terrain to max distance)
Rural Option
No Bldg Downwash
Simple Terrain (flat terrain to max distance)
Full Meteorology
Auto Distance Array
Terrain Height 0m
Min Distance 750m (Property Boundary)
Max Distance 100km
Distance to Max. Concentration 1117m

TABLE 1
TYPICAL IPSC COAL
PHYSICAL AND CHEMICAL CHARACTERISTICS

Type of Analysis	Parameter	Actual Average
Proximate	Volatile	38.1%
	Moisture	8.5 %
	Ash	9.2 %
	Fixed Carbon	44.2%
ASTM Other	Sulfur	0.52 %
	Heating Value	11,850 btu/lb
	Grindability	46 HGI
Ultimate	%C	66.47 %
	%H	4.77 %
	%N	1.28 %
	%S	0.52 %
	%O	9.26 %
Trace	Antimony	3.1 ppm
	Arsenic	12 ppm
	Barium	113 ppm
	Beryllium	0.38 ppm
	Cadmium	0.66 ppm
	Chromium	24 ppm
	Cobalt	2.9 ppm
	Copper	7.8 ppm
	Hydrogen Chloride	299 ppm
	Hydrogen Fluoride	63 ppm
	Lead	7.1 ppm
	Manganese	9.9 ppm
	Mercury	0.061 ppm
	Nickel	4.7 ppm
	Selenium	2.4 ppm
	Vanadium	5.6 ppm
	Zinc	7.4 ppm
Mineral (Ash)	Silicon Dioxide	63.2 %
	Aluminum Oxide	15.5 %
	Titanium Dioxide	0.8 %
	Iron Oxide	3.3 %
	Calcium Oxide	7.1 %
	Magnesium Oxide	2.9 %
	Potassium Oxide	1.5 %
	Sodium Oxide	2.1 %
	Phosphorus Pentoxide	0.2 %
	Sulfur Trioxide	4.2 %
	Silica Equivalent Value	86.4 %
	Base:Acid Ratio	0.21
	Fusion Temperature (Fluid)	2333+ F

NOTE:

Data provided here are estimates only, based on available industry-wide information combined with specific analyses. These are not limits, but arithmetic means bounded by wide ranges of concentrations that are dependent on fuel source and type. Solid fuels naturally have wide variability in characteristics. This fuel information is in no way intended to represent binding fuel parameters.